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LTF CLUB MANAGEMENT CO., LLC  
and LIFE TIME FITNESS, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

SAMUEL TURNER, individually, and on  
behalf of other members of the general  
public similarly situated and on behalf of  
other aggrieved employees pursuant to the  
California Private Attorneys General Act,  
Plaintiff,

vs.

LTF CLUB MANAGEMENT CO., LLC,  
an unknown business entity; LIFE TIME  
FITNESS, INC., an unknown business  
entity; and DOES 1 through 100, inclusive,  
Defendants.

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Case No. 2:20-cv-00046-DAD-JDP

[Removed from Sacramento Superior  
Court, Case No. 34-2019-00269609]

**JOINT NOTICE OF SETTLEMENT**

Action Filed: November 21, 2019

TO THE CLERK AND THE HONORABLE COURT:

PLEASE TAKE NOTICE, pursuant to Local Rule 160(a), that Plaintiff Samuel Turner (“Plaintiff”) and Defendants LTF Club Management Co., LLC and Life Time, Inc. (“Defendants”) (collectively, the “Parties”) have reached a class action settlement in the above-entitled matter. The Parties are in the process of memorializing the terms of their settlement agreement. Plaintiff anticipates filing a motion for preliminary approval of the settlement in approximately 60 to 90 days.

Dated: October 15, 2024

**PROSKAUER ROSE LLP**  
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LAURA L. VAUGHN

By /s/ Gregory W. Knopp  
Gregory W. Knopp  
Attorneys for Defendant  
LTF CLUB MANAGEMENT, LLC AND  
LIFETIME, INC.

Dated: October 15, 2024

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By /s/ Celene Chan Andrews  
Celene Chan Andrews  
Attorneys for Plaintiff  
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**\*\*Pursuant to L.R. 131(e), I attest that concurrence in the filing of this document has been obtained from each of the above other signatories.**